

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
LAUREN BICKFORD-BUSHEY,

Plaintiff,

-against-

**GREYHOUND LINES, INC. and THE GOODYEAR TIRE
and RUBBER COMPANY,**

Defendants.
-----X

GREYHOUND LINES, INC.,

Third-Party Plaintiff,

v.

**MOTOR COACH INDUSTRIES, INC. and UGL
UNICCO, Formerly Known As UNICCO Service
Company,**

Third-Party Defendants.
-----X

**ANSWER TO
CROSS-CLAIMS**

**Civil Action No.
08 CIV 4465 (PKL)**

**[Related to
06 CIV 13371 (PKL)]**

**JURY TRIAL
DEMANDED**

Defendant/Third-Party Plaintiff, GREYHOUND LINES, INC., by its attorneys, FABIANI COHEN & HALL, LLP, as and for an Answer to the Cross-Claims of Defendant, THE GOODYEAR TIRE & RUBBER COMPANY ("GOODYEAR"), sets forth, upon information and belief, the following:

**AS AND FOR AN ANSWER TO THE
FIRST CROSS-CLAIM AGAINST
GREYHOUND LINES, INC.**

EIGHTY-SIXTH: Defendant/Third-Party Plaintiff, GREYHOUND LINES, INC., denies each and every allegation contained in Paragraph No. "86" of the Defendant GOODYEAR's Answer to Complaint dated June 26, 2008 and begs leave to refer to all relevant agreement for

their complete terms and conditions including the agreement dated October 3, 2000 which is referred to below.

EIGHTY-SEVENTH: Defendant/Third-Party Plaintiff, GREYHOUND LINES, INC., denies each and every allegation contained in Paragraph No. "87" of the Defendant GOODYEAR's Answer to Complaint dated June 26, 2008.

**AS AND FOR AN ANSWER TO THE
SECOND CROSS-CLAIM AGAINST
GREYHOUND LINES, INC.**

EIGHTY-EIGHTH: Defendant/Third-Party Plaintiff, GREYHOUND LINES, INC., repeats, reiterates, realleges and incorporates herein each and every assertion and denial contained in Paragraph Nos. "EIGHTY-SIXTH" and "EIGHTY-SEVENTH" above and denies each and every allegation contained in Paragraph Nos. "1" through "85" of Defendant GOODYEAR's Answer to Complaint dated June 26, 2008 to the extent that any such allegations are made against GREYHOUND LINES, INC. and begs leave to refer to all relevant agreements for their complete terms and conditions including the October 3, 2000 agreement referred to below.

EIGHTY-NINTH: Defendant/Third-Party Plaintiff, GREYHOUND LINES, INC., denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph No. "89" of Defendant GOODYEAR's Answer to Complaint dated June 26, 2008, except admits that GREYHOUND LINES, INC., and GOODYEAR entered into an agreement dated October 3, 2000, a copy of which is annexed to GREYHOUND's Answer to Consolidated Complaint as Exhibit "A" and begs leave to refer to the terms of said agreement at the time of trial.

NINTIETH: Defendant/Third-Party Plaintiff, GREYHOUND LINES, INC., denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in

Paragraph No. "90" of Defendant GOODYEAR's Answer to Complaint dated June 26, 2008, except admits that GREYHOUND LINES, INC., and GOODYEAR entered into an agreement dated October 3, 2000, a copy of which is annexed to GREYHOUND's Answer to Consolidated Complaint as Exhibit "A" and begs leave to refer to the terms of said agreement at the time of trial.

NINETY-FIRST: Defendant/Third-Party Plaintiff, GREYHOUND LINES, INC., denies each and every allegation contained in Paragraph No. "91" of the Defendant GOODYEAR's Answer to Complaint dated June 26, 2008, except admits that counsel for GOODYEAR sent a letter dated January 30, 2008 to counsel for GREYHOUND LINES, INC. and that counsel for GREYHOUND LINES, INC., responded by letter dated February 5, 2008.

NINETY-SECOND: Defendant/Third-Party Plaintiff, GREYHOUND LINES, INC., denies each and every allegation contained in Paragraph No. "92" of the Defendant GOODYEAR's Answer to Complaint dated June 26, 2008.

NINETY-THIRD: Defendant/Third-Party Plaintiff, GREYHOUND LINES, INC., denies each and every allegation contained in Paragraph No. "93" of the Defendant GOODYEAR's Answer to Complaint dated June 26, 2008.

WHEREFORE, defendant/third-party plaintiff, GREYHOUND LINES, INC., demands:

1. Judgment dismissing the Complaint;
2. Judgment dismissing GOODYEAR's Cross-Claims against defendant/third-party plaintiff, GREYHOUND LINES, INC.

3. Together with the costs and disbursements of this action.

Dated: New York, New York
July 1, 2008

Yours, etc.,

FABIANI COHEN & HALL, LLP



Kevin B. Pollak (KBP 6098)
Attorneys for Defendant/
Third-Party Plaintiff
GREYHOUND LINES, INC.
570 Lexington Avenue, 4th Floor
New York, New York 10022
(212) 644-4420

TO: HERRICK, FEINSTEIN, LLP
Attorneys for Defendant
**THE GOODYEAR TIRE &
RUBBER COMPANY**
2 Park Avenue
New York, New York 10016
(212) 592-1400

LAW OFFICE OF MARK SCHNEIDER
Attorneys for Plaintiff
LAUREN BICKFORD-BUSHEY
57 Court Street
Plattsburgh, New York 12901
Attention: Mark Schneider, Esq.
(518) 566-6666

TAUB & MARDER
Attorneys for Plaintiffs
**TERESITA SANTIAGO, RAMON
LORENZO and TERESITA SANTIAGO,**
as mother and natural guardian of **KAREN
SANTIAGO DIAZ and HENRY LORENZO,**
infants; **MARIA MERCEDES ROSARIO
BRETON, FABIAN GARCIA and
PAOLA GARCIA**
450 Seventh Avenue, 37th Floor
New York, New York 10123
(212) 967-1122

RICH & RICH, P.C.
Attorneys for Plaintiff
ZIBO WANG
30 Vesey Street
New York, New York 10007
(212) 406-0440

KREINDLER & KREINDLER
Attorneys for Plaintiffs
KIRSTEN ANDERSON, CHRISTIAN YOPA,
ABI-SARA MACHOLD and
CINDYLYN LaMARCHE
100 Park Avenue, 18th Floor
New York, New York 10017
(212) 687-8181

GOLDBERG SEGALLA, LLP
Attorneys for Plaintiff
LAURE BOUDET
5789 Widewaters Parkway
Syracuse, New York 13214
(315) 413-5400

RUBENSTEIN & RYNECKI, ESQS.
Attorneys for Plaintiffs
BETTY DORCE EXUME, as Administratrix
of the Estate of **ANTONIDE DORCE**, deceased,
and **BETTY DORCE EXUME**, individually,
JACQUELIN BERTRAND and
MARIE LILIANE MILARD
16 Court Street, Suite 1717
Brooklyn, New York 11241
(718) 522-1020

NORMAN LISS, ATTORNEYS-AT-LAW, P.C.
Attorneys for Plaintiffs
SHERRY ANN GEORGE, SHERRY ANN
GEORGE, as Mother and Natural Guardian of
VOSHONA GEORGE, Infant, and **SHERRY ANN GEORGE**
and **ALLISON IDOHOU**, as Co-Administrators of the
ESTATE OF DOREEN GEORGE, Deceased
200 West 57th Street
New York, New York 10019
(212) 586-6165

VALAD and VECCHIONE PLLC

Attorneys for Plaintiffs

CHEIKH SIDY MOHAMED TAMBADOU and OURY CISSE,

Individually and as Co-Liquidators of the

Estate of SOULEYMANE TAMBADOU, deceased,

3863 Plaza Drive

Fairfax, VA 22030

(703) 352-4800

THE LIETZ LAW FIRM, PLLC

Attorneys for Plaintiffs

CHEIKH SIDY MOHAMED TAMBADOU

and OURY CISSE, Individually and as Co-Liquidators

of the Estate of SOULEYMANE TAMBADOU, deceased,

888 16th Street North West

Suite 800

Washington, DC 20006

(202) 349-9869

E. STEWART JONES, PLLC

Attorney for Plaintiff

CINDYLYN LAMARCHE

28 Second Street

Troy, New York 12181

(518) 274-5820

OFFICE OF JAY H. TANENBAUM

Attorneys for Plaintiff

LIONEL CADELIS

110 Wall Street, 16th Floor

New York, New York 10005

(212) 422-1765

CHAPMAN, ZARANSKY LAW FIRM

Attorneys for Plaintiff

LIONEL CADELIS

114 Old Country Road, Suite 680

Mineola, New York 11501

(516) 741-6601 ext. 226

LAW OFFICE OF EDWARD P. RYAN

Attorneys for Plaintiffs

MAMADOU SAIDOU BAH and GNALEN BAH

38 Eagle Street

Albany, New York 12207

(518) 465-2488

LAW OFFICES OF NEIL MOLDOVAN

Attorney for Plaintiffs

SYLVINA JEAN CLAVIEN and RAPHAEL DANIS

One Old Country Road - Suite 270

Carle Place, New York 11514

(516) 294-3300

NOVACK BURNBAUM CRYSTAL LLP

Attorneys for Third-Party Defendant

MOTOR COACH INDUSTRIES, INC.

300 East 42nd Street

New York, New York 10017

(212) 682-4002

ARNSTEIN & LEHR LLP

Attorneys for Third-Party Defendant

MOTOR COACH INDUSTRIES, INC.

120 South Riverside Plaza, Suite 1200

Chicago, Illinois 60606

(312) 876-7100

QUIRK and BAKALOR, P.C.

Attorneys for Third-Party Defendant

UGL UNICCO

845 Third Avenue, 15th Floor

New York, New York 10022

(212) 319-1000

Lauren Bickford-Bushey v. Greyhound Lines, Inc., et al. v. Motor Coach Industries, Inc., et al.
Civil Action No.: 08 CIV 4465 (PKL)
Our File No. 818.34464

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing **ANSWER TO CROSS-CLAIMS** was served via CM/ECF and First-Class Mail, postage prepaid, this 2nd day of July, 2008, to:

HERRICK, FEINSTEIN, LLP
2 Park Avenue
New York, New York 10016

LAW OFFICE OF MARK SCHNEIDER
57 Court Street
Plattsburgh, New York 12901

TAUB & MARDER
450 Seventh Avenue, 37th Floor
New York, New York 10123

RICH & RICH, P.C.
30 Vesey Street
New York, New York 10007

KREINDLER & KREINDLER
100 Park Avenue, 18th Floor
New York, New York 10017

GOLDBERG SEGALLA, LLP
5789 Widewaters Parkway
Syracuse, New York 13214

RUBENSTEIN & RYNECKI, ESQS.
16 Court Street, Suite 1717
Brooklyn, New York 11241

NORMAN LISS, ATTORNEYS-AT-LAW, P.C.
200 West 57th Street
New York, New York 10019

VALAD and VECCHIONE PLLC
3863 Plaza Drive
Fairfax, VA 22030

THE LIETZ LAW FIRM, PLLC
888 16th Street North West
Suite 800
Washington, DC 20006

E. STEWART JONES, PLLC
28 Second Street
Troy, New York 12181

OFFICE OF JAY H. TANENBAUM
110 Wall Street, 16th Floor
New York, New York 10005

CHAPMAN, ZARANSKY LAW FIRM
114 Old Country Road, Suite 680
Mineola, New York 11501

LAW OFFICE OF EDWARD P. RYAN
38 Eagle Street
Albany, New York 12207

LAW OFFICES OF NEIL MOLDOVAN
One Old Country Road - Suite 270
Carle Place, New York 11514

NOVACK BURNBAUM CRYSTAL LLP
300 East 42nd Street
New York, New York 10017

ARNSTEIN & LEHR LLP
120 South Riverside Plaza, Suite 1200
Chicago, Illinois 60606

QUIRK and BAKALOR, P.C.
845 Third Avenue, 15th Floor
New York, New York 10022

Sworn to before me this
2nd day of July, 2008.

NOTARY PUBLIC

INGRID A. SANTOS - CASTILLO
Notary Public, State Of New York
No. 01SA5075460
Qualified in New York County
Commission Expires 03/31/2011

389620.1

Kevin B. Pollak (6098)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LAUREN BICKFORD-BUSHEY,

Plaintiff,

08 CIV 4465 (PKL)

v.

[Related to
06 CIV 13371 (PKL)]

GREYHOUND LINES, INC., and THE GOODYEAR
TIRE & RUBBER COMPANY,

JURY TRIAL DEMANDED

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MOTOR COACH INDUSTRIES, INC. and UGL
UNICCO, Formerly Known as UNICCO Service
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Third-Party Defendants.
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ANSWER TO CROSS-CLAIMS

FABIANI COHEN & HALL, LLP
Attorneys for Defendant/Third-Party Plaintiff
GREYHOUND LINES, INC.
570 Lexington Avenue, 4th Floor
New York, New York 10022
(212) 644-4420

To: Attorney(s) for:
Sir(s):

PLEASE TAKE NOTICE that a _____ of which the within is a (true) (certified)
copy

[NOTICE OF ENTRY was duly entered in the within named court on _____ 2008

[NOTICE OF SETTLEMENT will be presented for settlement to the Hon.
one of the judges of the within named court at the Courthouse at on _____, 2008 at _____ o'clock

Dated:

Yours, etc.,
FABIANI COHEN & HALL, LLP
Attorneys for Defendant/Third-Party Plaintiff
570 Lexington Avenue, 4th Floor
New York, New York 10022
(212) 644-4420

To: